REMARKS

Claims 236-241, 243-292, 294-299, 301-350, 352-357, 359-408, and 409-429 are

pending in this application. Claims 242, 293, 300, 351, 358, and 409 have been cancelled.

Applicants respectfully request reconsideration of the above-identified application, in view of the

amendments and the following remarks.

Support for the amendments can be found in the specification, including on pages

14 and 18.

Claim Rejections – 35 U.S.C. § 103(a)

Claims 236-429 have been rejected under 35 U.S.C. § 103(a) as being

unpatentable over Coley et al., U.S. Patent 5,751,914 (hereinafter Coley) in view of Kung, U.S.

Patent 5,159,685 (hereinafter Kung). Applicants respectfully submit that independent claims 236,

262, 294, 320, 352, 378, 410, 411 and 412 and dependent claims depend therefrom as amended

are patentably distinct from the cited references taken either alone or in combination.

All of the independent claims have been amended to require that an event is

converted in said client to a well-defined event prior to processing or that a well-defined event is

received by a server from a client. Independent claims 236 and 262 recite, *inter alia*:

> 236. A method for facilitating event communication
> among networks having a plurality of systems,
> comprising:
> receiving at least one event in a client, said event
> transmitted by an event-generating entity coupled
> thereto;
> *converting said event in said client to a well-defined*
> *event*;

> determining ...;
> obtaining ...; and
> processing .... (emphasis added)

*   *   *

262. A method for facilitating event communication among networks
having a plurality of systems, comprising:

> receiving at least one *well-defined* event at a server, wherein said
> *well-defined* event is forwarded to said server from a client coupled
> thereto;
> determining a priority for said well-defined event;
> obtaining ...; and
> processing .... (emphasis added)

Applicants respectfully submit that Coley and Kung do not disclose, teach or suggest the

elements, as recited in independent claims 236, 262, 294, 320, 352, 378, 410, 411 and 412 as

amended.

Coley discloses a method and system for efficiently correlating a plurality of

events within a data processing system to determine an action to be performed (Coley Abstract).

The system in Coley is managed by a network management platform running on a gateway

server 28 (Coley, column 3, lines 52-56), which is separate from the local area network 32 or 10.

(FIG. 1) The network management platform includes an event correlation engine 60 (Coley,

column 4, lines 31-33, *see also* FIG. 3) As shown in FIG. 3, the event correlation engine 60

includes an Event Converter 76 which parses "each detected event into an internal event object"

(Coley, column 8, lines 32-36). In Coley, the event is received and parsed into an internal event

object on the centralized gateway server 28 (column 4, lines 31-33), not on the local area

networks 32 or 10.

- 31 -

   Kung discloses an Expert Network Diagnostic System 10 (ENDS) for providing

diagnostics to a data communications network 5. Alarms from a Network Manager 24 are

received by an Event Manager 117 (Kung Abstract), which is part of ENDS on the central site

(Kung, column 11, lines 52-59, *see also* FIG. 1). FIG. 1 illustrates a data communication

network 5 interconnected with ENDS and a Network Manager 24 (Kung, column 8, lines 59-62).

Network objects send alarms to the Network Manager 24 (Kung, column 10, lines 47-49),

Network Manager 24 forwards the alarms to Event Manager 117 (Kung, column 11, lines 65-66).

Event Manager 117 then constructs a "record" using the information about the event, and places

it in the queue (Kung, column 11, line 67- column 12, line 1). As shown in FIG. 1, both the

Network Manager 24 and the Event Manager 117 are on the central site, which is separate from

the communication network 5 (Kung, column 11, lines 52-59, *see also* FIG. 2). Therefore, in

Kung, the alarms are received and constructed into a "record" on the central site, not on the data

communications network 5.

   In summary, both Kung and Coley disclose systems where the events are

received and converted into internal event objects or records on the centralized site. By contrast,

the amended claims of the present invention require that the events are generated and converted

into a well-defined event (ttEvent) on the client's site or that the server receives the well-defined

events from the client. Accordingly, Applicants submit that the amended claims 236, 262, 294,

320, 352, 378, 410, 411 and 412 are patentably distinct from both Coley's and Kung's systems.

Moreover, Applicants submit that the combination of Coley and Kung would create a system

patentably different from the claimed invention. To combine Coley and Kung would generate a

system where the events are received and converted on a centralized server, whereas the current

invention discloses a system where the events are detected and converted to a well-defined event

on the client's site.

The specification describes the advantages for converting a received event into a

well-defined event on the client site. For example, such well-defined event can be stored and

prioritized prior to processing in a manner such that it will facilitate one well-defined event to

check across many processing paths to determine the next processing step if it depends on

another well-defined event to finish processing or to change the state of a particular property.

Another advantage, by way of example, is that converting an event into a well-defined event

prior to processing alleviates bottlenecks in large-scale peer-to-peer connectivity, and helps

achieve real scalability in a peer network.

Thus, Applicants respectfully submit that independent claims 236, 262, 294, 320,

352, 378, 410, 411, 412, and claims 237-261, 263-293, 295-319, 321-351, 353-377, 379-409 and

413-429, which are directly or indirectly dependent therefrom, are patentably distinct from the

cited Coley and Kung references, taken either alone or in combination. Accordingly, Applicants

respectfully request withdrawal of the rejections.

CONCLUSION

It is now believed that all pending claims are in condition for allowance. In view

of these remarks, an early and favorable reconsideration is respectfully requested.

Respectfully submitted,

MORGAN & FINNEGAN, L.L.P.

Dated: August 4, 2005   By: _Ping Gu_____

Ping Gu

Registration No. L0040

Correspondence Address:

MORGAN & FINNEGAN, L.L.P.
3 World Financial Center
New York, NY 10281
(212) 415-8700 (telephone)
(212) 415-8701 (facsimile)

927564 v1